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Attorneys for Defendant  
5 JUAN CARLOS MARTINEZ CASTRO

6  
7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA, ) Case No. 2:19-cr-233 TLN  
10 )  
Plaintiff, ) STIPULATION AND ORDER TO CONTINUE  
11 ) STATUS CONFERENCE, AND TO EXCLUDE  
vs. ) TIME  
12 )  
JUAN CARLOS MARTINEZ ) Date: April 2, 2020  
13 CASTRO, and SHANNON JEFFRIES, ) Time: 9:30 a.m.  
Judge: Hon. Troy L. Nunley  
14 Defendants. )  
\_\_\_\_\_ )

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16 IT IS HEREBY STIPULATED by and between the parties hereto through their  
17 respective counsel, U.S. Attorney McGregor Scott, through Assistant United States Attorney  
18 Justin Lee, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant  
19 Federal Defender Hannah Labaree, attorney for defendant Juan Carlos Martinez Castro, and  
20 Christopher Cosca, attorney for defendant Shannon Jeffries, that the previously-scheduled status  
21 conference date of April 2, 2020, be vacated and the matter be set for status conference on June  
22 11, 2020 at 9:30 a.m, at the defendants' request.

23 On January 14, 2020, the government produced 28 pages of paper discovery. On  
24 February 20, 2020, 339 additional Bates-stamped items of discovery were produced, consisting  
25 of photographs as well as audio recordings. Counsel for the defendants will require time to  
26 review the new discovery, conduct independent investigation, and meet with their clients to  
27 review the material.  
28

The current COVID-19 pandemic presents significant barriers to undersigned counsels' ability to accomplish the required tasks to adequately represent their clients, as communication with the clients is stymied by the restrictions on face-to-face contact. Moreover, Ms. Jeffries is incarcerated at the Sacramento County Jail, which currently does not provide a safe and confidential means by which counsel may meet with his client. Review of discovery, discussion of sentencing exposure in the case, and private communications surrounding possible avenues of defense investigation are therefore completely stalled at this time. With respect to Mr. Martinez Castro, while he is out of custody and thus able to communicate confidentially via telephone with his attorney, he is currently unable to review non-documentary evidence in his case as he does not have access to a home computer. The process of producing this discovery in a format which Mr. Martinez Castro has the technology to review (such as a CD player), requires additional time as the Federal Defender Office is operating on a skeleton crew and in-office staff are overloaded with tasks.

For all these reasons, Defense counsel believe that the failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from this order's date through and including June 11, 2020, pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4, based upon continuity of counsel and defense preparation.

Counsel and the defendant also agree that the ends of justice served by the Court granting this continuance outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

Dated: March 30, 2020

HEATHER E. WILLIAMS  
Federal Defender

*/s/ Hannah Labaree*  
HANNAH LABAREE  
Assistant Federal Defender  
Attorney for Defendant  
Juan Carlos Martinez Castro

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Dated: March 30, 2020

/s/Christopher Cosca  
CHRISTOPHER COSCA  
Attorney for Defendant  
Shannon Jeffries

Dated: March 30, 2020

MCGREGOR SCOTT  
United States Attorney

/s/Justin Lee  
JUSTIN LEE  
Assistant U.S. Attorney  
Attorney for Plaintiff

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